

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: GENERIC PHARMACEUTICALS  
PRICING ANTITRUST LITIGATION

MDL No. 2724  
16-MD-2724  
Hon. Cynthia M. Rufe

THIS DOCUMENT RELATES TO:

*All Actions*

**Declaration of John M. Taladay Regarding Notice of  
Proposed Settlement Pursuant to 28 USC. § 1715**

I, John M. Taladay, declare and state as follows:

1. I have personal knowledge of the matters stated herein, and if called to testify as a witness, I could and would testify competently to the following facts.
2. I am a partner with the law firm of Baker Botts LLP, which serves as counsel for Sun Pharmaceutical Industries, Inc. and its affiliates Caraco Pharmaceutical Laboratories, Ltd., Mutual Pharmaceutical Company, Inc., and URL Pharma, Inc. (collectively “Sun”) in the above-captioned action.
3. I submit this declaration upon personal knowledge detailing Sun’s compliance with the notice requirements of the Class Action Fairness Act, 28 U.S.C. § 1711, *et seq.* (“CAFA”).
4. On March 16, 2022, Plaintiffs filed their Motion for Preliminary Approval of Settlement with Defendant Sun. (Dkt. No. 2010).
5. On March 23, 2022, pursuant to 28 U.S.C. § 1715(a) & (b), Baker Botts staff, acting under my direction, served a cover letter and certain accompanying documents outlined in the letter (the “CAFA Notice”), upon the U.S. Attorney General and the appropriate

government officials for all fifty states, the District of Columbia, American Samoa, Guam, the Northern Mariana Islands, Puerto Rico, and the U.S. Virgin Islands.

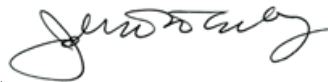
6. As required by 28 U.S.C. § 1715(b), the CAFA Notice included copies of:
- (i) the operative complaints as well as all prior complaints filed in this matter;
  - (ii) the Settling Direct Purchaser Plaintiffs' Motion for an Order (1) Certifying a Settlement Class, (2) Granting Preliminary Approval of Settlement Agreements, (3) Appointing Settlement Class Counsel, (4) Appointing a Claims Administrator and Escrow Agent, (5) Approving the Form and Manner of Notice to the Settlement Class, (6) Preliminarily Approving the Plan of Allocation, and (7) Scheduling a Fairness Hearing ("DPP Motion for Preliminary Approval"); the Memorandum in Support of DPP Motion for Preliminary Approval; Exhibit A, the Declaration of Dianne M. Nast in Support of the DPP Motion for Preliminary Approval; Exhibit B, the Declaration of Eric J. Miller Regarding Proposed Notice Plan; Exhibit C, Proposed Notice of Proposed Class Action Settlement; Exhibit D, Proposed Publication Notice; Exhibit E, Direct Purchaser Plaintiffs' Proposed Plan of Allocation for the Settlement Class; Exhibit F, the Declaration of Jeffrey J. Leitzinger, Ph. D. Regarding Certification of the Sun-Taro Settlement Class; Exhibit G, the Declaration of Jeffrey J. Leitzinger, Ph.D Related to Proposed Allocation Plan; a Proposed Order for Preliminary Approval; and a redacted copy of the Letter of Agreement between Sun and Settling Direct Purchaser Plaintiffs referenced in paragraph 9 of the Settlement Agreement.; and

(iii) a listing of the names of the Sun customer class members who reside in each state.

7. Attached hereto as Exhibit A is a true and correct copy of the letter that was mailed as described in Paragraph 5.
8. Attached hereto as Exhibit B is the list of names and addresses of the government officials upon whom CAFA Notice was served.
9. Baker Botts has not received any communications from the recipients of the CAFA Notice.
10. To the best of my knowledge, Sun has fully complied with CAFA and has satisfied all obligations thereunder.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 27th day of February, 2023 in the District of Columbia.

A handwritten signature in black ink, appearing to read "John M. Taladay", with a stylized, cursive script.

John M. Taladay